



U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL AVIATION ADMINISTRATION  
National Policy

ORDER  
8110.103

Effective Date:  
09/28/07

**SUBJ:** Alternative Methods of Compliance (AMOC)

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**1. Purpose of this Order.** This order explains how to manage requests for alternative methods of compliance (AMOC) to airworthiness directives (AD). This order shows how to:

- a. Advise AMOC requesters whether an AMOC is necessary,
- b. Identify who can approve an AMOC request,
- c. Differentiate between a transferable and non-transferable AMOC,
- d. Correctly approve, deny, revise, or revoke an AMOC,
- e. Handle requests for global AMOCs (also known as AMOCs of general applicability), and
- f. Handle AMOC requests from other civil aviation authorities (CAA) and foreign owners/operators.

**2. Audience.** We've written this order for all Federal Aviation Administration (FAA) aircraft certification service (AIR) personnel responsible for AMOCs. It is also written for flight standards service (AFS) inspectors, aircraft evaluation group (AEG) personnel, certain designated engineering representatives (DERs) and delegated organization authorized staff members.

**3. Where to Find This Order.** You can find this order on the FAA's Regulatory and Guidance Library (RGL) website at <http://rgl.faa.gov> or the Directives Management website at MyFAA employees website at [https://employees.faa.gov/tools\\_resources/orders\\_notices/](https://employees.faa.gov/tools_resources/orders_notices/).

**4. Defining an AMOC.**

a. An AD contains the required method for correcting an unsafe condition. An AMOC is a different way, other than the one specified in an AD, to address the unsafe condition on an aircraft, aircraft engine, propeller or appliance. An AMOC must ensure the unsafe condition is corrected by providing an acceptable level of safety.

b. In this order, we use the term AMOC to define an FAA-approved alternative method of compliance to the specific requirements of an AD, including a change in the required time to accomplish the AD. We also use the term "product" to refer to an aircraft, aircraft engine, propeller, or appliance per Title 14 of the Code of Federal Regulations (14 CFR) §39.3.

c. Before 2002, provisions for applying for AMOCs were included in many individual ADs. In August 2002, we added amendment 39-9474 to 14 CFR part 39. The amendment

incorporated several standard provisions previously required to be included in individual ADs. One standard provision specified that the AD apply to the product even if it had been modified, altered, or repaired in the area addressed by the AD. Another standard provision let an owner or operator address the unsafe condition in a different way than specifically required by the AD. This provision allowed an AMOC to be found acceptable to the FAA.

## **5. When and Why an AMOC is Necessary or Desirable.**

**a.** An AMOC is required if an owner/operator cannot or does not wish to comply with the actions specified in an AD. Appendix B of this order offers some questions and answers about when an AMOC is necessary.

**b.** Why an AMOC may be necessary or desirable include, but is not limited to the following:

- (1) To accomplish AD actions in a way that better suits an owner/operator's business processes.
- (2) An owner/operator devises another or better way of addressing the unsafe condition.
- (3) An owner/operator wishes to adjust the compliance time to an AD.
- (4) Because existing modifications, alterations, or repairs to a product make compliance with AD procedures difficult or impossible.
- (5) To use later revisions of service documents specified in an AD, or
- (6) A superseding AD invalidates previous AMOCs to the original AD.

## **6. Who Approves AMOCs?**

**a.** Each AD identifies the office responsible for approving AMOCs to the AD. Sometimes this responsibility transfers to another office. If so, the office identified in the AD is responsible for forwarding AMOC requests to the currently responsible office.

(1) For products where the United States is the state of design, the responsible office will be an aircraft certification office (ACO). The term ACO includes the unique certification offices, such as the engine certification office (ECO), rotorcraft certification office (RCO), special certification office (SCO), the *airplane* certification office, and the military certification office (MCO).

(2) For products where the United States is *not* the state of design, the responsible office will most likely be an Aircraft Certification Service directorate, or in some cases, an ACO.

**b.** Some ACOs have authorized certain company DERs and delegated organizations to review and approve AMOC requests for certain AD-required structural modifications, alterations, and repairs. See paragraph 10 for more details.

c. While for most ADs a principal inspector (PI) can't approve an AMOC request, they may comment on an AMOC proposal (such as pointing out the unique characteristics of the requester's fleet and operation) before forwarding it to the manager of the FAA office identified in the AD.

**7. The AMOC Process.** 14 CFR § 39.19 states that "anyone may propose to FAA an alternative method of compliance or a change in the compliance time, if the proposal provides an acceptable level of safety." We may approve the proposed AMOC if it provides an acceptable level of safety to that required by the AD. See figure 1 at the end of paragraph 7 for the general flow of AMOC processes. The steps are explained in the following subparagraphs.

**a. Handling AMOC Requests.**

(1) Unless we authorize otherwise, instruct AMOC requesters to send the proposal to their PI, plus, if they wish, a copy to the manager of the FAA office identified in the AD. If the requester doesn't have a PI (such as a design approval holder (DAH)), advise them to send the proposal directly to the manager of the FAA office identified in the AD. The FAA office in the AD is responsible for coordinating the request with the appropriate AEG. Requesters may also submit AMOC proposals to certain delegated organizations or certain company structural DERs, if provided for in an AD. Use of this option falls under the "Unless FAA authorizes otherwise" clause in 14 CFR § 39.19. See paragraph 10 for more details.

(2) The requester should submit a letter proposing an AMOC. The letter should include:

(a) Their name and complete mailing address;

(b) The affected product(s), model designation(s), serial number(s) (if applicable), and State of Registry (if known);

(c) The AD number and specific AD paragraph(s) to which the proposal applies;

(d) A complete and detailed description of the AMOC proposal, including (where applicable):

- Part names,
- Part numbers,
- Part serial numbers,
- Descriptions of damage (fatigue cracks or corrosion),
  - Existing or affected modifications, alterations, or repairs,
- Alternative inspection methods, compliance times, and repeat intervals,
- Technical descriptions of alternative processes or procedures,
- Pictures and drawings, and
- Other details necessary to define the acceptable level of safety that the AMOC will achieve.

(e) Substantiating data showing why we should determine that the proposed AMOC corrects the unsafe condition with an acceptable level of safety. Some examples are:

1. Data proving that a different inspection method will produce acceptable results.

2. Analysis showing that a previously modified, altered, or repaired structure in the area addressed by the AD redirects the load paths to eliminate the potential for cracking (the unsafe condition) identified in the AD.

(f) If the requester wants to change their airplane/rotorcraft flight manual, instruct them to submit the affected sections of the manual and the proposed changes.

**b. Approving an AMOC.**

(1) If the office responsible for approving AMOCs to the AD has delegated AMOC approval authority to a DER or delegated organization, then follow the AMOC process as shown in FAA Orders 8110.37, *Designated Engineering Representative Handbook*, or 8100.15, *Organization Designation Authorization Procedures*, as applicable. See paragraph 10 of this order for more information on delegated AMOCs.

(2) If the office responsible for approving AMOCs to the AD has not delegated AMOC approval authority, they assign an engineer to evaluate the AMOC request.

(3) The assigned engineer must ensure that the proposal provides an acceptable level of safety. When reviewing an AMOC proposal, the FAA engineer should review the comments received from the requester's PI. If there is no comment or concurrence from the PI, the engineer should contact the PI, FSDO, AEG, or other appropriate flight standards service personnel for help evaluating any unique fleet or operational characteristics.

**Note:** For the purpose of this order, FSDO means a flight standards district office, flight standards certification management office and/or flight standards international field office (IFO).

**c. Determining Whether AMOCs Can Be Transferred.** If the engineer determines that the AMOC proposal provides an acceptable level of safety, the next determination is whether the AMOC should be transferable. A transferable AMOC is an AMOC that will continue to apply to a product after it has been transferred to a new owner/operator. The holder of a transferable AMOC can make the approval document available to someone else who receives a product covered by that document. Engineers must be careful when determining transferability, and not make AMOCs transferable if the AMOC depends on:

- A particular maintenance program schedule, which may not transfer with the product,
- Procedures, facilities, or processes *unique* to the requester,
- The particular way the aircraft is flown or how the product is used in the aircraft or requester's fleet,

- Recurring inspections or other maintenance actions unique to a requester's maintenance program, or
- Any other factors *unique* to the requester.

**d. Notification of Approval.** If approving an AMOC, the responsible office must send an approval letter to the requester, plus a copy to the requester's PI (or, lacking a PI, their local FSDO). As an option, (and if the PI agrees) the responsible office can instead send the approval letter to the PI with a request for the PI to forward the approval letter to the requester. The manager of the responsible office (or person acting on the manager's behalf) must sign the approval letter. The approval letter must, as a minimum:

- (1) Clearly state the AD number and specific AD paragraph(s) to which the AMOC applies.
- (2) Specify the make and model designation(s) or other limiting factor (like serial number(s), registration number(s), or part number(s)) to which the AMOC applies.
- (3) Reference the substantiating or other data used to establish the acceptable level of safety which was the basis for approving the AMOC.
- (4) Identify any restrictions on the AMOC, such as applicability, special procedures, facilities, processes, or time limitations.
- (5) If applicable, refer to the appropriate service documents by number, revision level, and date of revision.
- (6) State whether the AMOC is transferable or not.
- (7) Include the following statements:

"Before using this AMOC, notify your appropriate principal inspector (PI) in the FAA Flight Standards District Office (FSDO), or lacking a PI, your local FSDO."

"This approval is subject to the following condition: If in the future the [ACO or Directorate] determines that this AMOC does not provide an acceptable level of safety, the [ACO or Directorate] may revoke or revise the terms of the AMOC following notice to the requester and a seven-day opportunity for the requester to comment on the revocation or proposed revision."

**Note:** If some of the information in paragraphs 7d(1) thru 7d(5) are contained in the AMOC proposal, you may instead refer to the information in the proposal and attach it to the AMOC approval letter.

**e. Denying an AMOC.** If the proposal does not provide an acceptable level of safety, then the office responsible for approving AMOCs to the AD must deny the AMOC proposal. The responsible office must send a denial letter to the requester, plus a copy to the requester's PI (or lacking a PI, their local FSDO). As an option, (and if the PI agrees) the responsible office can instead send the denial letter to the PI with a request for the PI to forward the denial letter to the requester. The manager of the responsible office (or person acting on the manager's behalf) must sign the denial letter. The AMOC denial letter should state the general reasons the proposed AMOC did not establish the acceptable level of safety necessary for approval.

**f. Revising or Revoking an AMOC.** Although it should be rare, there may be times when a previously issued AMOC must be revised or revoked. As an example, a DAH may determine that an action approved in an AMOC does not perform as intended, and provides this information to the office that approved the AMOC. Revising or revoking an AMOC becomes necessary if, for any reason, the AMOC no longer provides an acceptable level of safety.

(1) The office responsible for approving AMOCs to the AD must correct any previously approved AMOCs that do not achieve an acceptable level of safety. To revise or revoke a previously approved AMOC, the responsible office must send a letter to the AMOC requester proposing a revision to or revoking the AMOC. The office must send a copy to the requester's PI (or lacking a PI, their local FSDO). As an option, (and if the PI agrees) the responsible office can instead send the letter to the PI, asking the PI to forward the letter to the requester.

(2) The letter proposing a revision to the previously approved AMOC, for AMOCs approved by letter with the statements in **7d(7)**, must include the following statements:

"This is to inform you that we have determined that the AMOC to AD [XXXX-XX-XX], approved by letter dated [MM-DD-YYYY], does not provide an acceptable level of safety. This determination is based on [XX]. Therefore, we are proposing that the AMOC be revised, as follows:

[XX].

We propose that this revision become effective on [MM-DD-YYYY].

You may submit comments on this proposal no later than [seven days from date, unless there is an immediate safety-of-flight issue], which we will consider before making a final decision."

(3) The letter revoking the previously approved AMOC, for AMOCs approved by letter with the statements in **7d(7)**, must include the following statements:

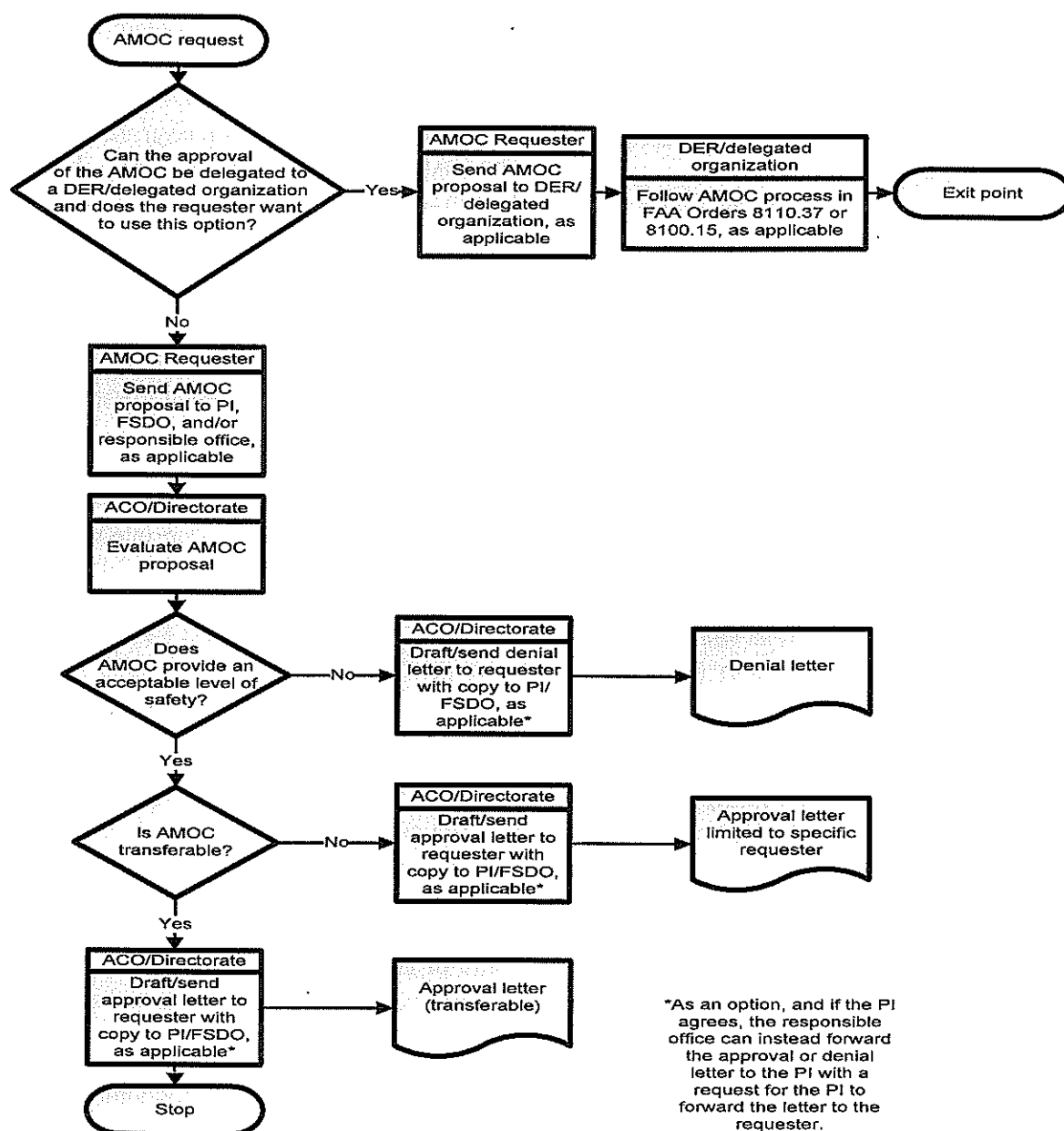
"This is to inform you that we have determined that the AMOC to AD [XXXX-XX-XX], approved by letter dated [MM-DD-YYYY], does not provide an acceptable level of safety. This determination is based on [XX]. Therefore, we are revoking the AMOC.

This revocation will become effective on [MM-DD-YYYY].

You may submit comments on this revocation no later than [seven days from date, unless there is an immediate safety-of-flight issue], which we will consider before making a final decision.”

- (4) In both cases (revising or revoking an AMOC), if there is an immediate safety-of-flight issue, you can reduce the comment period to less than seven days, or state that the revision/revocation is effective immediately.

Figure 1. AMOC Processes



## **8. Global AMOCs (AMOCs of General Applicability).**

a. A global AMOC is a way to approve an AMOC for multiple owners/operators. A global AMOC can be useful if the office responsible for approving AMOCs to an AD expects to receive multiple requests for the same AMOC. A global AMOC normally covers the entire range of products cited in the applicability section an AD. Therefore, rather than applying to specific owner/operators, a global AMOC applies to (and is normally transferable with) the product.

b. An ACO or directorate issues a global AMOC to a third party (such as a DAH or type club) for the particular product affected by the AD. If the third party is a DAH, they can then notify the affected owner/operators by adding a statement in service documents (including revisions to service documents) describing which engineering aspects of the service documents are an AMOC to the applicable AD (or particular portions of the AD). The third party can distribute the AMOC approval letter and if necessary, attach the related service document. The following is an example of when a global AMOC is appropriate:

- An AD mandates accomplishment of a service bulletin (SB) on certain aircraft. The DAH later develops revision A to the SB. The DAH requests an AMOC for all those aircraft affected by the AD to use revision A of the SB in place of the original SB.

c. The minimum requirements for issuing a global AMOC approval letter are in paragraphs 7d(1) thru 7d(7) above. The office responsible for approving AMOCs to the AD sends the global AMOC approval and denial letters to the third party. The responsible office is not required to send a copy of AMOC letters to a PI or FSDO for global AMOCs. However, owner/operators are still responsible for notifying their PI (or lacking a PI, their local FSDO) before using a global AMOC.

d. FAA approval of a global AMOC applies only to U.S.-registered aircraft. Approval of this type of AMOC for a foreign-registered aircraft is the responsibility of the appropriate CAA of the state of registry. As used in this order, a "global AMOC" is also defined as an "AMOC of general applicability," a term used in some bilateral agreements. The office responsible for approving AMOCs to the AD must share global AMOCs to that AD with Transport Canada and the European Aviation Safety Agency (EASA) under the terms of our bilateral agreements.

## **9. AMOC Requests From Foreign Entities Where U.S. is the State of Design.**

a. We receive requests from foreign entities to approve AMOC requests for products of U.S. state of design that are not on the U.S. registry. Such requests can come from a foreign owner/operator, a U.S. state of design approval holder, or another CAA on behalf of a foreign owner/operator. We respond to such requests because:

(1) It's appropriate to give a foreign owner/operator or another CAA technical recommendations related to an AD we issued on a product of U.S. state of design. As the state of design, we have the most familiarity with the product.

(2) It can minimize urgent requests for AMOCs in the future. Some aircraft change registration often, sometimes during maintenance. A foreign registered aircraft today could be



U.S.-registered tomorrow. The importing owner/operator must demonstrate AD compliance before the FAA can determine the aircraft to be airworthy. Our timely response to a foreign request for an AMOC, while the aircraft is on its registry, can speed up future determinations.

b. We can recommend approval of AMOCs for aircraft not currently on the U.S. registry, but only the state of registry can approve the AMOCs. We don't have the authority to approve AMOCs on behalf of another CAA. If an owner/operator places an aircraft on a foreign registry, they must maintain it per the CAA of state of registry's regulations, which may be different from ours.

c. When responding to AMOC requests from foreign entities, use the appropriate template in AIR-40 Guidance Memo 03-02 –*Templates and Guidance for International Correspondence*. The template is titled "FAA Evaluation of a Request for an AMOC Associated with a Foreign Registered Aircraft". You can access the latest version on the MyFAA page: <https://employees.faa.gov/org/linebusiness/avs/offices/AIR/> At the AIR page, under Divisions and Directorates, select "International Policy AIR-40" At the IPO page, under Job Aids/Policy Memorandums, select "Current Memos." If you can't access or have questions about the template, contact the FAA International Policy Office, AIR-40.

(1) Our AMOC recommendation letters to foreign entities must clearly note that since the aircraft is not registered in the United States, the FAA does not have the authority to approve the AMOC and that approval must come from the appropriate CAA.

(2) Coordinate any AMOC letters to foreign entities that do not follow the template, or that involve a particularly sensitive situation, with AIR-40.

(3) When replying to direct AMOC requests from foreign owner/operators, always send a copy to the CAA overseeing that operator, and if different, the CAA of the state of registry. Contact AIR-40 if you are uncertain of the appropriate CAA contact.

(4) Many times there is a responsible international field office (IFO) that deals with a foreign owner/operator. As an option, you can coordinate the AMOC request with the IFO and have them forward the FAA AMOC recommendation letter to the foreign owner/operator.

## 10. Delegated AMOCs.

a. Some ACOs authorize certain delegated organizations or company structural DERs to review and approve AMOC requests. ACOs can delegate AMOC approvals only for ADs where the requester intends to restore an airplane's structure to its type certification basis or other known, defined, and published standards. This includes:

- Certain AD-mandated structural modifications, alterations, or repairs where no previous FAA-approved action exists, and
- Fully substantiated temporary structural repairs, if the standards required by the AD are well defined.

b. FAA Order 8110.37 permits ACOs to delegate AMOC approval authority to a DAH company DER. See FAA Order 8110.37 for information on what authorized DERs can do within this delegated function. In the company DER letter of authorization, ACOs must identify the special delegation of AMOC approval. See FAA Order 8100.8, *Designee Management Handbook*, for more information on DER appointments.

c. ACOs can delegate AMOC approval authority to specifically authorized delegated organization staff members in two types of organizations:

- DAH type certificate organization designation authorization (ODA), or
- DAH delegation option authorization.

d. See FAA Orders 8100.9, *DAS, DOA, and SFAR 36 Authorization Procedures* or 8100.15 for more information on delegating AMOC approvals to organizations.

e. ACOs must ensure that restrictions applicable to foreign-registered aircraft are followed by DERs/delegated organizations (see paragraph 9).

f. The office responsible for approving AMOCs to an AD can terminate delegated authority for approving AMOCs at any time, and for *any* reason they deem appropriate. See Order 8100.8 for more information on terminating DER delegated authority. See Orders 8100.9 or 8100.15 for more information on terminating organization-delegated authority.



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**Appendix A. Questions from AMOC Requesters****1. Service Documents in ADs.**

**a. I converted the AD and the referenced instructions in the referenced service document to an in-house fleet campaign notice, engineering change order, or individual work cards. Do I need an AMOC?**

No, if you transfer the AD language to your own in-house instructions and those instructions precisely represent all of the AD requirements and compliance times.

**b. I complied with the referenced instructions in the service document revision referenced in the AD before the AD was issued. Do I need an AMOC?**

Maybe. If the AD specifically allows previously accomplished work, you don't need an AMOC. If it is unclear whether the work done prior to the AD is acceptable, contact the office that issued the AD.

**c. Do I need an AMOC if I accomplish the instructions in a later version of the DAH service document referenced in the AD?**

Yes, any deviations from the technical requirements of the specific document referenced in an AD will need an AMOC. So, if the aircraft DAH did not obtain an AMOC approval for the later version of the service document, you will need to apply for an AMOC. Contact the DAH or FAA office responsible for approving AMOCs to the AD to determine whether the DAH got an AMOC for the service document revision.

**d. The referenced instructions in the referenced service document in the AD call for a specific fastener on my aircraft. May I substitute another fastener?**

No. You cannot use a different fastener (or any part, material, or process) from what is specifically referenced in an AD without getting an AMOC, unless the procedures in the AD permit substitution. If you substitute another fastener without an AMOC, you violate 14 CFR § 39.7 each time you operate the aircraft.

**e. The AD requires me to perform actions in a service document by a certain date. The service document recommends a date that is later than required by the AD. I want to perform the actions at the later date, per the service document. Do I need an AMOC?**

Yes. AD requirements override any other language in service documents. You would have to request an AMOC for a change in compliance time to that referenced in the service document.

**f. The AD requires that I accomplish specific instructions in a service bulletin. Those instructions reference a manual, and the manual references a standard practice manual. My operating procedure differs from the standard practice manual. Do I need an AMOC to keep using my operating procedure?**

Yes. You must accomplish the specific instructions in the service bulletin specified in the AD. That includes any second- or third-tier documents referenced in those service bulletin instructions.

**2. *Changes in the Area Addressed by ADs.***

**a. I previously repaired my aircraft structure in the area now addressed by the AD. The repair affects my ability to perform the AD. Must I obtain an AMOC for the AD?**

Yes. If a change to a product affects your ability to accomplish the actions required by the AD in any way, you must request FAA approval of an AMOC. Unless you can show the change eliminated the unsafe condition, your request should include the specific actions that you propose to address the unsafe condition.

**b. During the last AD inspection, I found the crack that the AD warned about. I obtained an approved repair from the aircraft DAH, which differs from the repair mandated by the AD. Do I need an AMOC for the repair?**

Yes, you must comply with the specific requirements of the AD. So, unless the AD stated that you could repair the crack according to a specific method approved by the DAH, you or the DAH must apply for and obtain an AMOC if any action differs from the specific requirements of the AD.

**c. I developed a repair for cracks identified in an AD using my organization designation authorization. May I use this repair instead of obtaining a repair from the aircraft DAH, as prescribed in the AD?**

No. Before using any repair that differs from the requirements of an AD you must receive an AMOC for the repair.

**d. The AD requires that I visually inspect for cracks. However, the previous owner/operator installed a repair doubler that prevents me from inspecting. Do I need an AMOC?**

Yes. Whenever you cannot apply the specific requirements of an AD, you must seek an AMOC. In this case, you must either devise a new method to inspect the area identified in the AD, or show that the repair reinforces the area and redistributes the loads, so an inspection is no longer required. In either case, you must request and obtain an AMOC to ensure compliance with the AD.

**e. The AD requires that I do an eddy current inspection of a structural area. There is a repair doubler behind the area that interferes with the eddy current readings, making them uncertain. Do I need an AMOC for this AD?**

Yes. You need an AMOC any time a repair, modification, or alteration interferes with the results of a required inspection. This is particularly true when the results of the required inspection are questionable, even though you can physically perform the inspection.

### ***3. Removing and Replacing Appliances.***

**a. The applicability section of an AD lists an appliance that I previously removed from my aircraft. Is an AMOC required for the aircraft?**

No. You don't need an AMOC since the AD is not applicable to the aircraft without the appliance installed.

**b. The applicability section of an AD lists an appliance installed on my aircraft. I cannot accomplish the actions in the AD because I previously modified, deactivated, or partially removed the appliance. Do I need an AMOC?**

Yes. You should request an AMOC whenever you cannot apply the specific requirements of an AD. The AD still applies to the appliance even though it was modified, deactivated, or partially removed.

**c. The AD says I must install a specific version of software. I did that. Now I have received a later version of the same software from the DAH. Do I need an AMOC to install this later version?**

Yes. Unless the AD allows installation of the later version, you'll need an AMOC to install any version other than that specifically referenced.

### ***4. Superseding ADs.***

**a. An AD supersedes another AD applicable to my aircraft. I had received an AMOC for a different inspection procedure from what the original AD called out. Is my AMOC still valid?**

It depends on the superseding AD.

- *If the superseding AD includes a provision that AMOCs to the original AD inspection are approved as an AMOC to the superseding AD inspection,*
- *Then your AMOC is still valid for the superseding AD inspection.*

However:

- *If the superseding AD does not include such a provision,*
- *Then your AMOC is not valid for the superseding AD inspection.*

If you have any question concerning compliance with the superseding AD, contact the office responsible for approving AMOCs to the AD.

**b. An AD applying to my aircraft was superseded, adding a mandatory terminating action. It includes a provision that AMOCs to the inspection methods, approved in accordance with the original AD, are approved as AMOCs to the inspection methods in the superseding AD. Can I perform the AMOC inspection instead of accomplishing the terminating action?**

No. Even if an AMOC is valid, it's only valid for the actions specified in the superseding AD, not necessarily for the superseding AD as a whole. An AMOC inspection may be an acceptable alternative to the mandated inspection (if the superseding AD allows it), but not for the mandated terminating action. The terminating action must still be done within the compliance time specified in the superseding AD.

#### **5. *Previously Approved AMOCs.***

**a. I have a previously approved AMOC that applies to my aircraft. I was not the original AMOC requester, but it is transferable. Do I need to obtain ACO, directorate, or company DER approval before using it on my aircraft?**

No. However, you are responsible for notifying your PI (or lacking a PI, your local FSDO) before you use it.

**b. How can I find out who has an AMOC to an AD?**

Each AD identifies the office that initiated the AD. That office can provide information about AMOCs it has already approved.

**c. Can another owner/operator use my AMOC?**

Only if it is transferable and you make it available to them. The AMOC can only be used for the specific AD and paragraph(s) cited in the AMOC approval document. The owner/operator must ascertain that the AMOC applies to their product (that is, to the model and serial number), whether they can meet any restrictions identified, and that they can accomplish the specific instructions in the AMOC. They are also responsible for notifying their PI (or lacking a PI, their local FSDO) before using the AMOC.

**d. The DAH of my aircraft received a global AMOC for the engineering aspects of their service document. Do I need to request another AMOC if I use the same service document?**

No, but if you use the service document as an AMOC, you are responsible for notifying your PI (or lacking a PI, your local FSDO) before using it.

**e. Is there a fee for using AMOCs?**

We don't charge fees to use AMOCs. However, some AMOC holders may charge fees for allowing others to use their AMOC procedures. AMOCs can refer to specific accomplishment instructions, inspection methods, and components that are proprietary. If so, contact the person or organization with the approved AMOC and arrange to obtain the information and components you will need to accomplish the AMOC.

**6. AD Compliance Before Delivery.****a. The DAH (or production approval holder (PAH)) delivered my aircraft with AD status records (indicating compliance with all applicable ADs). Do I still need to get AMOCs for these ADs?**

No. AMOCs are not necessary if the AD status records show that all of the applicable ADs were complied with. Note that there might be recurring or terminating AD actions that are not yet due. To continue operating the aircraft, you are responsible for complying with these actions before they become due...

**b. I just received my aircraft, but cannot get an AD status record from the DAH (or PAH). AD XXXX-XX-XX applies to it. Do I need to take action?**

Yes. Before flying the aircraft, you must either comply with the AD as written, or obtain and implement your own AMOC.

**7. Returning Aircraft to Service.****a. How do I return my aircraft to service after receiving an AMOC?**

You may return your aircraft to service after receiving an AMOC only if you record the AMOC in your aircraft maintenance records as your method of compliance with the AD. Annotate the maintenance records as follows:

(1) AMOC approval letter from the [XXX] ACO (or Directorate) Manager dated [MM-DD-YYYY], or

(2) AMOC approval, FAA Form 8110-3, "Statement of Compliance with the Federal Aviation Regulations," dated [MM-DD-YYYY] from [company DER name and employer], or

(3) AMOC approval, FAA Form 8100-9, "Statement of Compliance with Airworthiness Standards," dated [MM-DD-YYYY] from [delegated organization staff member's name and employer], or

(4) Global AMOC approval letter from the [XXX] ACO (or Directorate) Manager to [third party name], dated [MM-DD-YYYY].

Note that you are responsible for notifying your PI (or lacking a PI, your local FSDO) before you use an AMOC.

**b. Do I need to keep a copy of the AMOC approval document for my records?**

Yes. All owners/operators must keep a copy of the AMOC approval document (an AMOC approval letter, FAA Form 8110-3, or FAA Form 8100-9). This record should include any referenced attachments or procedures until ownership of the product is transferred. These records must be readily accessible to FAA inspectors or National Transportation Safety Board investigators upon their request. An exception is that, for a global AMOC, you would not need to keep a copy of the approval letter.



## Appendix B. Administrative Information

**1. Distribution.** Distribute this order to the Washington headquarters division and branch levels of the Aircraft Certification Service and Flight Standards Service, to the headquarters division and regional divisions of the Flight Standards Service, to aircraft evaluation groups, to all Aircraft Certification Service directorates and certification offices and branches, manufacturing inspection offices (MIO), manufacturing inspection district offices (MIDO), manufacturing inspection satellite offices (MISO), all flight standards district offices (FSDO), aircraft certification and airworthiness branches of the FAA Academy, and the FAA International Policy Office, AIR-40.

### 2. Related Federal Regulations and Publications.

- 14 CFR §§ 39.7, 39.15, 39.19 and 39.21
- FAA advisory circular (AC) 20-114, *Manufacturers' Service Documents*
- AC 39-7, *Airworthiness Directives*
- AC 43-9, *Maintenance Records*
- AC 120-16, *Air Carrier Maintenance Programs*
- AC 120-77, *Maintenance and Alteration Data*
- FAA Manual FAA-IR-M 8040.1, *Airworthiness Directives Manual*
- FAA Order 8040.1, *Airworthiness Directives*
- FAA Order 8100.8, *Designee Management Handbook*
- FAA Order 8100.9, *DAS, DOA, and SFAR 36 Authorization Procedures*
- FAA Order 8100.15, *Organization Designation Authorization Procedures*
- FAA Order 8110.37, *Designated Engineering Representative Handbook*
- FAA Order 8300.10, *Airworthiness Inspector's Handbook*

**3. Suggestions for Improvement.** If you find any deficiencies, need clarification, or want to suggest improvements to this directive, send a copy of FAA Form 1320-19, Directive Feedback Information (written or electronically) to the Aircraft Certification Service, Planning and Financial Resources Management Branch, AIR-530, Attention: Directives Management Officer.

You may also send a copy to the Aircraft Engineering Division, AIR-100, Attention: Comments to Order 8110.103. If you urgently need an interpretation, contact the Delegation and Airworthiness Programs Branch, AIR-140, at (405) 954-4103. Always use FAA Form 1320-19 to follow up each verbal conversation.

**4. Records Management.** See Orders 0000.1, *FAA Standard Subject Classification System*; 1350.14, *Records Management*; and 1350.15, *Records, Organization, Transfer and Destruction Standards*; or your office Records Management Officer or Directives Officer for guidance regarding retention or disposition of records.